



State of New Jersey

DEPARTMENT OF EDUCATION

PO Box 500

TRENTON, NJ 08625-0500

CHRIS CHRISTIE
Governor

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CHRISTOPHER D. CERF
Commissioner

August 19, 2013

Dr. Walter Rudder, Superintendent
Woodlynne Borough Board of Education
131 Elm Avenue
Woodlynne, NJ 08107

Dear Dr. Rudder:

The New Jersey Department of Education has completed a review of funds received and disbursed from one or more federal programs by the **Woodlynne Borough Board of Education**. The funding sources reviewed include titled programs for the Elementary and Secondary Education Act (ESEA) and the Individuals with Disabilities Education Act (IDEA). The review covered the period July 1, 2011 through April 29, 2013. The resulting report is enclosed. Please provide a copy of the report to each board member. All issued Consolidated Monitoring Reports will be posted on the department's website at <http://www.state.nj.us/education/finance/jobs/monitor/consolidated>.

Utilizing the process outlined in the attached "Procedures for LEA/Agency Response, Corrective Action Plan and Appeal Process," the Woodlynne Borough Board of Education is required, pursuant to N.J.A.C. 6A:23A-5.6, to publicly review and discuss the findings in this report at a public board meeting no later than 30 days after receipt of the report. Within 30 days of the public meeting, the board must adopt a resolution certifying that the findings were discussed in a public meeting and approving a corrective action plan which addresses the issues raised in the undisputed findings and/or an appeal of any **monetary** findings in dispute (emphasis added). A copy of the resolution and the approved corrective action plan and/or appeal must be sent to this office within 10 days of adoption by the board. Direct your response to my attention.

Also, pursuant to N.J.A.C. 6A:23A-5.6(c), you must post the findings of the report and the board's corrective action plan on your district's website.

By copy of this report, your auditor is requested to comment on all areas of noncompliance and recommendations in the next certified audit submitted to the New Jersey Department of Education. If you have any questions, please contact Anthony Hearn at (609) 633-2492.

Sincerely,

Robert J. Cicchino, Director
Office of Fiscal Accountability and Compliance

RJC/AH/dk:Woodlynne BoroughBOE Cover Letter/consolidated monitoring
Enclosures

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WOODLYNNE BOROUGH SCHOOL DISTRICT
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New Jersey K-12 Education

**CONSOLIDATED MONITORING REPORT
AUGUST 2013**

District: Woodlynne Borough School District
County: Camden
Dates On-Site: April 29 and 30, 2013
Case #: CM-008-12

FUNDING SOURCES

Program	Funding Award
Title I	\$ 349,895
IDEA Basic	150,598
IDEA Preschool	6,419
Title IIA	28,855
Race to the Top	28,500
Total Funds	<u>\$ 564,267</u>

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BACKGROUND

The Elementary & Secondary Education Act (ESEA) and the Individuals with Disabilities Act (IDEA) and other federal laws require local education agencies (LEAs) to provide programs and services to their districts based on the requirements specified in each of the authorizing statutes (ESEA, IDEA, and Race to the Top). The laws further require that state education agencies such as the New Jersey Department of Education (NJDOE) monitor the implementation of federal programs by sub recipients and determine whether the funds are being used by the district for their intended purpose and achieving the overall objectives of the funding initiatives.

INTRODUCTION

The NJDOE visited the Woodlynne Borough School District to monitor the district's use of federal funds and the related program plans, where applicable, to determine whether the district's programs are meeting the intended purposes and objectives, as specified in the current year applications and authorizing statutes, and to determine whether the funds were spent in accordance with the program requirements, federal and state laws, and applicable regulations. The on-site visit included staff interviews and documentation reviews related to the requirements of the following programs: Race to the Top; Title I, Part A (Title I); Title II, Part A (Title IIA); and IDEA for the period July 1, 2011 through April 29, 2013 and planned expenses for the current year (2012-2013).

The scope of work performed included the review of documentation including grant applications, program plans and needs assessments, grant awards, annual audits, board minutes, payroll records, accounting records, purchase orders, a review of student records, classroom visitations and interviews with instructional staff to verify implementation of Individualized Education Programs (IEP), a review of student class and related service schedules, interviews of child study team members and speech-language specialists and an interview of the program administrator regarding the IDEA grant, as well as current district policies and procedures. The monitoring team members also conducted interviews with district personnel, reviewed the supporting documentation for a sample of expenditures and conducted internal control reviews.

EXPENDITURES REVIEWED

The grants that were reviewed included Race to the Top; Title I; Title IIA; and IDEA from July 1, 2011 through April 29, 2013. A sampling of purchase orders was taken from the entire population and later identified as to the grant that was charged.

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GENERAL DISTRICT OVERVIEW OF USES OF TITLE I, IDEA AND RACE TO THE TOP FUNDS

Title I Projects

The district is using its FY 2012-2013 Title I funds to implement a schoolwide program. Primarily, the district spent funds on language arts consultants, MAP testing, a Saturday program and an in-class support program during the day.

IDEA Projects (Special Education)

The FY 2012-2013 IDEA Basic funds are being used to reduce district tuition costs for students receiving special educational services in other public school districts and approved private schools for students with disabilities. Basic funds will also be used to support teaching staff working during the summer program and the purchase of supplies needed for special education programs. Preschool funds are being used to support a classroom assistant and the purchase of related services through an approved clinic and agency. No allocations were made for nonpublic schools.

Race to the Top

The district received board approval on November 28, 2012 and created an application, but the application was never submitted. The district did not want to bear additional costs that they thought would be necessary to support the teacher evaluation program. The review of this grant is being referred to the program office for additional follow up.

DETAILED FINDINGS AND RECOMMENDATIONS

Title I

Finding 1: The district could not provide evidence of distributing the written Title I parental involvement policy. Per the legislation, parents/guardians of Title I students must be informed of the availability of the parental involvement policy, which indicates how the district will support the involvement of parents in the academic program.

Citation: NCLB §1118(b): *Parental Involvement (School Parental Involvement Policy)*.

Required Action: For the 2013-2014 school year, the district must ensure its Title I written parental involvement policy is distributed to all parents/guardians. The district must provide to the NJDOE for review evidence of distributing the policy to families.

Finding 2: The district could not provide evidence of convening the annual Title I parent meeting. The parents/guardians in a Title I schoolwide program must be informed of the school's participation in Title I, Part A program, legislative requirements, and ways in which they can be involved in helping their child/children succeed academically.

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Citation: NCLB §1118(c)(1): *Parental Involvement (Policy Involvement)*

Required Action: The district must convene the FY 2013-2014 annual Title I meeting for the parents/guardians no later than October 15, 2013. The district must submit evidence of the meeting to the NJDOE for review (invitational letter/flyer, agenda, meeting minutes, and sign in sheets must be obtained).

Finding 3: The district did not have the required supporting documents to verify the activity of staff charged to the Title I or Title IIA grants. The documentation must reflect what the staff is doing and must match their funded percentage. This documentation is necessary to verify that grant-funded staff are actually performing grant-related duties.

Citation: OMB Circular A-87, Attachment B, Section 8(h): *Cost Principles for State, Local and Indian Tribal Governments (Compensation for personal services).*

Required Action: The district subsequently submitted time sheets for all funded staff and no further actions is needed.

Finding 4: A sampling of instructional staff determined three out of five staff did not meet the Highly Qualified Teacher (HQT) requirements, and the district did not issue the Parents' Right-to-Know follow-up letter to parents of students being taught by these teachers. The school is departmentalized in grades six through eight and the staff sampled in this area did not have the appropriate content area certification.

Citation: NCLB §1119: *Qualifications for Teachers and Paraprofessionals.*

Required Action: For the 2013-2014 school year, the district must ensure all teachers are placed in assignments for which they meet the HQT requirements. At the beginning of the school year, the district must issue the Parents' Right-to-Know letter to all parents. If after four consecutive weeks any children being taught by a teacher that does not meet the HQT requirements, the district must issue the Parents' Right-to-Know letter to the parents of those children.

Finding 5: There is no evidence the district is providing equitable services to resident nonpublic school students. The district was unable to provide any documentation of consulting with nonpublic schools. Without this documentation, the monitoring team could not verify that eligible resident nonpublic students, their families and their teachers were afforded the opportunity to participate in the Title I program.

Citation: NCLB §1120(a): *Participation of Children Enrolled in Private Schools (General Requirement).*

Required Action: The district must immediately contact nonpublic schools that enroll resident students to inform them of the opportunity to participate in the Title I program. The district must then schedule a consultation meeting with participating nonpublic

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schools and develop a plan to provide services to eligible resident nonpublic students. The district must submit documentation of the nonpublic consultation process (e.g., invitational letter, meeting notes, sign in sheets) to the NJDOE for review.

Finding 6: The district used Title I funds for curriculum development and common core implementation. Having a curriculum is a district responsibility; therefore, this expenditure supplants state/local funds.

Citation: NCLB §1120A(b): *Fiscal Requirements (Federal Funds to Supplement, Not Supplant, Non-Federal Funds)*.

Required Action: The district must reverse the charges for these unallowable expenditures and allocate state/local funds, rather than Title I funds, to support these expenditures. The district must submit documentation of the adjusting journal entry to the NJDOE for review.

Finding 7: The district's use of Title I funds to benefit the entire school during the summer of 2012 supplanted state/local funds. The school was not approved to begin operating a Title I schoolwide program until the beginning of the 2012-2013 Title I project period (September 1, 2012). However, the school began utilizing its Title I funds to benefit the entire school during the summer of 2012, which was prior to the 2012-2013 project period. Prior to September 1, 2012, the district was still operating a targeted assistance program and expenditures should have benefited identified Title I students only.

Citation: NCLB §1120A(b): *Fiscal Requirements (Federal Funds to Supplement, Not Supplant, Non-Federal Funds)*.

Required Action: The matter will be referred to the Office of Fiscal Accountability and Compliance for further review.

Finding 8: The district does not have a comprehensive equipment inventory for items purchased with Title I funds. All equipment purchased with federal funds must be properly inventoried, tracked and labeled.

Citation: EDGAR, PART 80--*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 32, Equipment.

Required Action: The district must develop a system to track equipment purchased with federal grants. Although the state threshold for reporting equipment is \$2,000 in the Electronic Web Enabled Grant (EWEG) system, the district may have its own lower threshold. The school must track any amount that is less expensive to track than it is to replace. All inventoried items must include tag number, cost, location, date of purchase; grant that funded the purchase and item description. The school must submit a comprehensive inventory of all equipment purchased to the NJDOE for review.

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Finding 9: The district was funding drug and alcohol counseling services through Genesis Counseling; however, the need for such services was not articulated in its schoolwide plan. Although the use of Title I funds in schoolwide programs allows significant flexibility, all interventions and strategies must be documented in the schoolwide plan.

Citation: NCLB §1114: *Schoolwide Program*.

Required Action: The district must reverse the expenditure for Genesis Counseling and allocate state/local funds for the expenditure. The district must send documentation of the adjusting journal entry to the NJDOE for review.

Title IIA

A review of the expenditures charged to the Title IIA grant yielded no findings.

IDEA (Special Education)

Finding 10: The district did not consistently implement each student's IEP as written due to lack of substitutes to provide coverage for teachers when absent. Special education teachers are pulled to provide coverage when substitutes were not available. As a result, programs and services identified in the IEP were not implemented by appropriately certificated staff.

Citation: N.J.A.C. 6A:14-4.1(a); 20 USC §1414(d)(A)(IV); 34 CFR §300.320(a)(4).

Total Funds

Required Action: The district must ensure each student determined eligible for special education and related services is receiving all programs and services identified in his or her IEP and that these services are implemented by appropriately certificated staff. In order to demonstrate correction of noncompliance, the district must develop procedures to ensure substitutes are available and that special education teachers are not pulled to provide coverage for absent teachers. A monitor from the NJDOE will conduct an on-site visit to interview staff, review the procedures and staff attendance logs.

Finding 11: The district did not consistently provide speech therapy as required in the IEPs of students eligible for special education and related services and students eligible for speech-language services. Noncompliance was due to a lack of district procedures.

Citation: N.J.A.C. 6A:14-4.1(a); 20 USC §1414(d)(A)(IV); 34 CFR §300.320(a)(4).

Required Action: The district must ensure each student receives related services as required in his/her IEP. In order to demonstrate correction of noncompliance, the district must develop procedures to ensure the speech-language therapists are available to provide services. Additionally, the district must convene IEP meetings to determine the need for compensatory services and, if necessary, develop a schedule for the provision of compensatory services. A monitor from the NJDOE will conduct an on-site visit to

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interview staff, review the developed procedures and documentation demonstrating the provision of compensatory speech-language services.

Finding 12: The district did not submit an application for dual use of educational space for approval to the Camden County Office of Education. Room 100 at the Woodlynne Borough Public School is being used for two instructional classes at the same time.

Citation: N.J.A.C. 6A:26-1.2, 5.1.

Required Action: Prior to the commencement of the 2013-2014 school year, the district must submit a request for dual use of educational space to the Camden County Office of Education. Until approval is received from the Camden County Office of Education, the district will not be allowed to use the classroom for more than one class at a time. A monitor from the NJDOE will conduct an on-site visit to interview staff and review the Camden County Office of Education approval for dual use.

Finding 13: The district did not consistently provide parents written notice that contains all required components, within 15 calendar days following reevaluation planning and eligibility meetings. Specifically, written notice did not document other options considered and/or other relevant factors discussed and why they were rejected.

Citation: N.J.A.C. 6A:14-2.3(f), (g), and (h); 20 U.S.C. §1415(b)(3) and(4); 34 CFR §300.503.

Required Action: The district must ensure parents are provided written notice following a meeting that contains all required components within 15 calendar days of the meeting. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. In addition, a monitor from the NJDOE will conduct an on-site visit to interview staff and review copies of written notice sent to parents following meetings conducted between September 2013 and December 2013 and the oversight procedures.

Finding 14: The district did not maintain documentation of attempts to obtain parental consent when planning to conduct reevaluations.

Citation: N.J.A.C. 6A:14-2.3(a); 20 U.S.C. §1414(a)(1)(D); and 34 CFR §300.300(c).

Required Action: The district must ensure parental consent to conduct assessments or documentation of attempts to obtain parental consent are maintained in students' files. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff and review copies of written parental consent to reevaluate and documentation of multiple attempts to obtain written consent when the

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parent does not provide consent to reevaluate for reevaluations conducted between June 2013 and December 2013 and to review the oversight mechanism.

Finding 15: The district did not consistently provide copies of evaluation reports to parents at least 10 days prior to the eligibility meeting.

Citation: N.J.A.C. 6A:14-3.5(a); 20 U.S.C. §1414(b)(4); and 34 CFR §300.306(a)

Required Action: The district must ensure the provision of copies of evaluation reports to parents not less than 10 days prior to the meeting to determine eligibility. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review documentation of the provision of reports to parents for evaluations conducted between September 2013 and December 2013 and to review the oversight mechanism.

Finding 16: The district did not consistently include goals and objectives in each IEP for students eligible for special education and related services. Additionally, criteria for and a statement of how progress towards annual goals will be measured were not consistently documented in IEPs.

Citation: N.J.A.C. 6A:14-3.7; 20 U.S.C. §1414(d)(1)(A); and 34 CFR §300.320(a).

Required Action: The district must ensure each IEP contains goals and objectives, criteria for and a statement of how progress towards annual goals will be measured. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. In addition, the district must conduct IEP meetings and revise IEPs for the specific students whose IEPs were identified as noncompliant during monitoring. For all other students, at the next IEP meeting the district must ensure IEPs contain measurable goals and objectives, as well as the criteria and method for reporting on progress toward the goals and objectives. Names of the students whose IEPs were identified as noncompliant will be provided to the district by the monitor. A monitor from the NJDOE will conduct an on-site visit to interview staff and review copies of revised IEPs along with IEPs for students whose annual review meetings were conducted between September 2013 and December 2013. For assistance with correction of noncompliance, the district is referred to the state IEP sample form which is located at: <http://www.state.nj.us/education/specialed/form/>.

Finding 17: The district did not consistently document all required considerations and statements in each IEP for students eligible for special education and related services and for students eligible for speech-language services. IEPs developed for students eligible for special education and related services did not consistently document the following components of special considerations:

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- language needs of a student with limited English proficiency;
- whether the student's behavior impedes his or her learning or that of others;
- for a student who is blind or visually impaired, the IEP team shall provide for instruction in Braille and the use of Braille, unless the IEP team determines that such instruction is not appropriate;
- communication needs;
- for a student who is deaf or hard of hearing, opportunities for direct communication with peers and professional personnel; and
- the need for assistive technology devices and services.

IEPs developed for students' eligible speech-language services did not consistently document the following components of special considerations:

- language needs of a student with limited English proficiency;
- communication needs;
- for a student who is deaf or hard of hearing, opportunities for direct communication with peers and professional personnel; and
- the need for assistive technology devices and services.

Citation: N.J.A.C. 6A:14-3.7(c), (e), and (f); 20 U.S.C. §1414(d)(3)(A)(B); and 34 CFR §300.324(a)(1)(2).

Required Action: The district must ensure each IEP contains all required components. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citations listed above. To demonstrate the district has corrected the individual instances of noncompliance, the district must conduct annual review meetings and revise IEPs for specific students whose IEPs were identified as noncompliant. For all other students, at the next IEP meeting the district must ensure that IEPs contain the required considerations. Names of the students whose IEPs were identified as noncompliant will be provided to the district by the monitor. A monitor from the NJDOE will conduct an on-site visit to interview staff, review the revised IEPs, review IEPs for students whose annual review meetings were conducted between September 2013 and December 2013 and review the oversight procedures. For assistance with correction of noncompliance, the district is referred to the state IEP sample form which is located at: <http://www.state.nj.us/education/specialed/form/>.

Finding 18: The district did not consistently document in the IEPs of students removed from the general education setting for more than 20 percent of the school day, consideration of placement in the least restrictive environment (LRE). Specifically, IEPs did not consistently include:

- the supplementary aids and services considered;
- an explanation of why the supplementary aids and services were rejected;
- document the comparison of the benefits provided in the regular class and the benefits

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- provided in the special education class;
- the potentially beneficial or harmful effects which a placement in the general education setting have on the students with disabilities or other students in the class; and
- for student in separate settings, district activities necessary to move the student to a less restrictive environment.

Citation: N.J.A.C. 6A:14-4.2, 3.7(k); 20 U.S.C. §1412(a)(5); 34 CFR §300.114.

Required Action: The district must ensure when determining the educational placement of a child with a disability, the IEP team considers the general education class first and all required decisions regarding the placement are documented in the IEP for each student removed from general education for more than 20 percent of the school day. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above. To demonstrate the district has corrected the individual instances of noncompliance, the district must conduct annual review meetings and revise the IEPs for specific students that were identified as noncompliant. For all other students removed from general education for more than 20 percent of the day, the district must ensure the IEPs contain documentation of consideration of placement in the LRE. Names of the students with IEPs that were identified as noncompliant will be provided to the district by the monitor. A monitor from the NJDOE will conduct an on-site visit to interview staff, review the revised IEPs, review IEPs of students removed from the general education setting for more than 20 percent of the school day whose IEP meetings were held between September 2013 and December 2013 and review the oversight procedures.

Finding 19: The district did not consistently document in student IEPs the relevant factors considered when determining whether a student requires an extended school year program (ESY) and a description of the ESY program when warranted.

Citation: N.J.A.C. 6A:14-4.3(c); 20 U.S.C. §1412(a)(1); 34 CFR §300.106.

Required Action: The district must ensure consideration of ESY is documented in the IEP. In order to demonstrate correction of noncompliance, the district must conduct training for speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above. Additionally, the district must conduct annual review meetings to review/revise IEPs for the specific students whose IEPs were identified as noncompliant during monitoring visit. Names of the students whose IEPs were identified as noncompliant will be provided to the district by the monitor. A monitor from the NJDOE will conduct an on-site visit to interview staff, review the revised IEPs, review the IEPs of students whose IEP meetings were held between September 2013 and December 2013 and review the oversight procedures.

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Finding 20: The district did not consistently maintain documentation of the description, frequency, duration and effectiveness of the interventions provided in the general education setting through the Intervention and Referral Service (I&RS).

Citation: N.J.A.C. 6A:14-3.3(c).

Required Action: The district must ensure interventions are provided in the general education setting for students exhibiting academic and/or behavioral difficulties prior to referring the student for an evaluation. In addition, the district must ensure that when the I&RS team identifies interventions to meet the needs of a struggling learner they identify and maintain documentation of the description, frequency, duration of the interventions and the effectiveness. In order to demonstrate correction of noncompliance, the district must conduct training for administrators and staff and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review documentation for students who were provided interventions in general education between September 2013 and December 2013 and review the oversight procedures.

Finding 21: The district did not consistently conduct meetings within 20 calendar days of receipt of a written request for a child study evaluation to determine if an evaluation was warranted.

Citation: N.J.A.C. 6A:14-3.3(e).

Required Action: The district must ensure identification meetings are conducted within 20 calendar days of receipt of a written request for evaluation and that required participants are in attendance. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review the dated initial request for evaluation for students eligible for special education and related services along with documentation of identification meetings conducted between September 2013 and December 2013 and the oversight procedures.

Finding 22: The district did not consistently conduct multidisciplinary initial evaluations for students referred for speech-language services by obtaining an educational impact statement from the classroom teacher after receipt of written parental consent to evaluate.

Citation: N.J.A.C. 6A:14-2.5(b)6 and 3.6(b).

Required Action: The district must ensure a multidisciplinary evaluation is conducted for students referred for speech-language services by obtaining a statement from the general education teacher that details the educational impact of the speech problem on the student's progress in general education. In order to demonstrate correction of noncompliance, the district must conduct training for speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the

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citation listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review initial evaluation reports for students whose eligibility meetings were held between September 2013 and December 2013 and review the oversight procedures.

Finding 23: The district did not maintain written certification for each child study team evaluator as to whether his/her report reflects the conclusion of eligibility for the student.

Citation: N.J.A.C. 6A:14-3.4(h)5.

Required Action: The district must maintain the written certification of each child study team evaluator as to whether his/her evaluation report reflects the conclusion of eligibility for each student they evaluated. In order to demonstrate correction of noncompliance, the district must conduct training for child study team members and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review documentation of identification and eligibility meetings conducted for students eligible for special education and related services between September 2013 and December 2013 and review the oversight procedures.

Finding 24: The district did not conduct all required sections of the functional assessment as a component of initial evaluations for students referred for speech-language services. Specifically, evaluation reports did not consistently include an interview with the child's parent.

Citation: N.J.A.C. 6A:14-3.4(g)4.

Required Action: The district must ensure that all components of the functional assessments are conducted as part of the initial evaluations process. In order to demonstrate correction of noncompliance, the district must conduct training for speech-language specialists and develop an oversight mechanism to ensure compliance with the requirements in the citation listed above. A monitor from the NJDOE will conduct an on-site visit to interview staff, review speech-language evaluation reports developed between September 2013 and December 2013 for students referred for speech-language services and review the oversight procedures. For assistance with correction of noncompliance, the district is referred to the sample report form for speech-language evaluations which is located at: <http://www.state.nj.us/education/specialed/form/>.

Finding 25: The district does not provide the full continuum of placement options to students eligible for special education and related services or make placement decisions based on the needs of the student. Through interviews with staff it was determined that placement decisions are based on available space and staffing in existing programs.

Citation: N.J.A.C. 6A:14-4.2(a); 20 U.S.C. §1412(a)(5); and 34 CFR §300.115.

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Required Action: The district must ensure the full continuum of placement options are available to students eligible for special education and related services and placement decisions are made by the IEP team and are based on the needs of the student. In order to demonstrate correction of noncompliance, the district must revise their procedures and provide training to child study team members on the newly developed procedures. At the next IEP meeting for each student, the district must ensure placement decisions are made in accordance with state and federal regulations. A monitor from the NJDOE will conduct an on-site visit to interview staff, review IEPs developed between September 2013 and December 2013 and review program options available to students with disabilities.

Race to the Top

There were no findings for the Race to the Top grant because the application was not finalized and submitted as of the date of the visit.

Administrative

Finding 26: The district has internal control policies and procedures to prevent contracting with disbarred vendors, but there was no evidence of implementation.

Citation: EDGAR, PART 80--*Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments*, Section 36, Procurement.

Required Action: The district must update its procedures to demonstrate implementation of the internal control policies to prevent errors from potentially occurring.

The NJDOE thanks you for your time and cooperation during the monitoring visit and looks forward to a successful resolution of all findings and implementation of all recommendations contained in this report.

If you have any questions, please contact Anthony Hearn via phone at (609) 633-2492 or via email at anthony.hearn@doe.state.nj.us.